

Margaret M. Fox

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November 17, 2011

Ms. Jocelyn Boyd Chief Clerk and Administrator South Carolina Public Service Commission Synergy Business Park, The Saluda Building 101 Executive Center Drive Columbia, South Carolina 29210

Application of Palmetto Telephone Communications, LLC to Expand Re: Authority to Provide Local Exchange and Exchange Access Service

Docket No. 2011-303-C

Dear Ms. Boyd:

Please find attached for filing a Motion for Expedited Review on behalf of Palmetto Telephone Communications, LLC in the above-referenced matter. By copy of this letter and Certificate of Service all parties of record are being forwarded a copy of this Motion.

If you have any questions or need further information, please do not hesitate to contact me

Very truly yours,

McNAIR LAW FIRM, P.A.

Margaretlu. Pax

Margaret M. Fox

MMF:rwm **Enclosures**

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BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2011-303-C

IN RE:

Application of Palmetto Telephone Communications, LLC)
to Expand Authority to Provide Local Exchange and)
Exchange Access Service to Customers Located in Certain)
Areas Currently Being Served by Frontier Communications)
of the Carolinas, Incorporated f/k/a Verizon South,)
Incorporated and United Telephone Company of the)
Carolinas, Incorporated d/b/a CenturyLink and Request for)
Flexible Regulation of Local Exchange Service Offerings.)

MOTION FOR EXPEDITED REVIEW

Palmetto Telephone Communications, LLC ("Palmetto") hereby respectfully moves for expedited review of its application for an expansion of its certificate of public convenience and necessity to authorize Palmetto to provide local exchange and exchange access service to customers located in certain areas currently being served by Frontier Communications of the Carolinas, Incorporated, f/k/a Verizon South, Incorporated, and United Telephone Company of the Carolinas, Incorporated d/b/a CenturyLink, and for flexible regulation of those service offerings.

Palmetto requests that this matter be decided by the Commission at the Commission's earliest opportunity in a regularly-scheduled agenda session, and that the Commission cancel the formal hearing on this matter, which is currently scheduled for December 21, 2011. This motion is made on the following grounds:

- 1. Palmetto published notice of the filing of the request in newspapers of general circulation, as required by the Commission. The deadline to intervene in this matter was September 12, 2011. Frontier Communications of America, Inc. ("Frontier") intervened in the proceeding as a party of record. As stated in Frontier's letter to the Commission dated November 16, 2011, Frontier and Palmetto have been able to clarify issues in this matter, and Palmetto does not oppose Palmetto's Application. Palmetto's counsel has also been advised that Frontier does not oppose Palmetto's request for expedited review of its Application.
- 2. The South Carolina Office of Regulatory Staff ("ORS") is a statutory party to this action. See S.C. Code Ann. § 58-4-10(B). On November 15, 2011, ORS filed the Direct Testimony of James M. McDaniel, in which Mr. McDaniel recommended on behalf of ORS that the Commission approve Palmetto's Application. Palmetto's counsel has consulted with counsel for ORS, and ORS does not object to proceeding without a formal hearing in this matter.
- 3. No other comments or petitions to intervene were received in response to the notice. Thus, all interested persons have been afforded an opportunity for a hearing, as required by S.C. Code Ann. § 58-9-280(B), Section 1-23-320(a) of the South Carolina Administrative Procedures Act, and constitutional due process. Proceeding without a formal hearing in this matter would serve the public interest in administrative efficiency.
- 4. Palmetto was previously granted certificates by the Commission in Docket Nos. 1999-309-C (Order No. 1999-617 granting certificate to provide resold interexchange telecommunications services within the State of South Carolina) and 2003-270-C (Order No. 2004-1 granting certificate to provide competitive local exchange and exchange access service to customers located in the Walterboro exchange, and approving flexible regulation

of Palmetto's local exchange service offerings). Palmetto is a wholly-owned subsidiary of Palmetto Rural Telephone Cooperative, Inc., which has operated as a telephone cooperative providing telecommunications service in South Carolina since 1955. The Commission is familiar with the operations and standing of both Palmetto and its parent cooperative.

5. On November 1, 2011, pursuant to the instructions of the Clerk's Office in its Prefile Testimony Letter dated August 10, 2011, Palmetto filed the testimony of Jason J. Dandridge in this docket. Attached to this Motion is a sworn verification executed by Mr. Dandridge attesting to the veracity of his pre-filed testimony. Mr. Dandridge's verified testimony, and the Attachments filed with the Application, demonstrate that the relief requested in the Application is warranted and that approval of the Application is in the public interest.

WHEREFORE, for the reasons stated above, Palmetto Telephone Communications, LLC respectfully requests that the Commission grant its request for expedited review of its application for an expansion of its certificate of public convenience and necessity in this matter, and that the Application be approved at the Commission's earliest convenience.

Respectfully Submitted,

Margaretlle. Fox

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Attorneys for Palmetto Telephone Communications, LLC

November 17, 2011

Columbia, South Carolina

VERIFICATION

I, Jason J. Dandridge, first being duly sworn, depose and say that I am Chief Executive Officer of Palmetto Telephone Communications, LLC; that I have read the foregoing pre-filed testimony and know the contents thereof; and that said contents are true.

SWORN to before me this

19 day of September, 2011.

Notary Public for South Carolina
My Commission expires: 7/25/2017

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2011-303-C

IN RE:

Application of Palmetto Telephone Communications, LLC to Expand Authority to Provide Local Exchange and Exchange Access Service to Customers Located in Certain Areas Currently Being Served by Frontier Communications of the Carolinas, Incorporated f/k/a Verizon South, Incorporated and United Telephone Company of the Carolinas, Incorporated d/b/a CenturyLink and Request for Flexible Regulation of Local Exchange Service Offerings.

CERTIFICATE OF SERVICE

I, Rebecca W. Martin, do hereby certify that I have this date served one (1) copy of the Motion for Expedited Review in the above-reference matter to the following parties causing said copy to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows.

Nanette S. Edwards, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, South Carolina 29201

C. Jo Anne Wessinger Hill, Esquire Steven W. Hamm, Esquire Richardson Plowden and Robinson, P. A. Post Office Drawer 7788 Columbia, South Carolina 29202

Rebecca W. Martin, Legal Assistant

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November 17, 2011

Columbia, South Carolina